

PHI-TEN USA, INC.

1860 W. Carson Street, Suite 101
Torrance, California 90501

Email: masayoshi-hirano@phiten.co.jp

Telephone: (310) 328-0319

Facsimile: (310) 328-0716

May 3, 2005

Dr. Robert J. Moore
Branch Chief, Compliance & Enforcement Branch
Office of Nutrition Products, Labeling & Dietary Supplements
Food & Drug Administration (HF S-800)
5100 Paint Brush Parkway
College Park, Maryland 20740

Re: Aqua Gold™, Dietary Supplement

Dear Dr. Moore:

Pursuant to 21CFR§101.93 of the Federal Food Drug, and Cosmetic Act, Phi-Ten USA, Inc. hereby notifies the Food and Drug Administration that it has begun commercializing Aqua Gold™ Dietary Supplement.

I. Dietary Supplements containing colloidal gold:

Aqua Gold™ is labeled and promoted with statements provided for in Section 403 (r)(6) of Federal Food, Drug and Cosmetic Act. Phi-Ten USA, Inc. will market Aqua Gold™ for use of dietary supplement at a level of two tablespoons (30 ml)/day.

II. Evidence of Safety:

Aqua Gold™, when used under the conditions recommended in the indicated labeling, is reasonably expected to be safe. The active ingredient, colloidal gold has been used and studied nationwide for many years at this dose level with an excellent tolerance profile (Refer to page 3).

III. Manufacturer:

Aqua Gold™ is manufactured and packaged by Phild Co., Ltd., 678 Tearaimizu-cho, Karasumadori, Nishikikoji-kado, Nakagyo-ku, Kyoto, 604-8152 Japan. Aqua Gold™ is imported and distributed by Phi-Ten USA, Inc., 1860 W. Carson Street, Suite 101, Torrance, California 90501.

IV. Health Claim:

Aqua Gold™ bears the label "Dietary Supplement." The display panel bears the following claim, "Natural mineral supplement containing colloidal gold." Aqua Gold™ does not bear any health claims. The label includes the disclaimer, "These statements have not been evaluated by the Food and Drug Administration. This product is not intended to diagnose, treat, cure, or prevent any disease."

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V. Active Ingredient:

The principal display panel bears the following structure/function claim, including the pure colloidal gold (10 ppl) and purified water (99.9%). No other dietary ingredient is contained in the supplement.

VI. Responsible Party:

Pursuant to 21CFR§101.93(c), please be advised that the information contained in the complete and accurate, and we have substantiation on file that this claim is truthful and not misleading.

If you have any questions, please feel free to contact me.

Sincerely yours,



Masayoshi Hirano
General Manager

Encl.

REFERENCES

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4. Mahdihassan, S: Cinnabar-Gold as the best Alchemical Drug of Longevity, called
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Phiten
AQUA GOLD
 Phiten Special Members Only

DIETARY SUPPLEMENT

Natural mineral supplement
 containing colloidal gold

500ml

CT, DE, HI, IA, ME,
 MA, MI, NY, OR, VT,
 CA CASH REFUND

For more information:
 1-800-7-PHITEN

Visit us at www.phitenusa.com
 Distributed by:

Phi-Ten USA Inc.
 1860 W. Carson St., Suite 101
 Torrance, CA 90501

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PRODUCT OF JAPAN

Directions:

As a dietary supplement,
 Take two tablespoons (30mL) daily.
 May be mixed with water or juice

Supplement Facts			
Serving size 2 tablespoons (30 mL)		Servings per container about 17	
Amount Per Serving		Calories	
		0	0
Total fat	0g	% Daily Value*	
Cholesterol	0g	0%	
Sodium	0g	0%	
Total Carbohydrates	0g	0%	
Protein	0g	0%	
Colloidal gold		10ppt	+
*Percent Daily Values are based on a 2,000 calorie diet			
+Daily value not established			

Ingredients:

Purified water, 99.9% pure colloidal gold (10 ppt)

THESE STATEMENTS HAVE NOT BE EVALUATED BY THE
 FOOD AND DRUG ADMINISTRATION. THIS PRODUCT IS
 NOT INTENDED TO DIAGNOSE, TREAT, CURE OR
 PREVENT ANY DISEASE.